



**KEYSTONE CEMENT COMPANY**  
P.O. BOX A, BATH, PA 18014-0058 TELEPHONE: (610) 837-1881



February 28, 2011

Office of Enforcement and Compliance Assurance  
Office of Federal Activities, International Compliance  
Assurance Division (2254A),  
Environmental Protection Agency,  
1200 Pennsylvania Ave., NW.,  
Washington, D.C. 20460

**RE: Keystone Cement Company Bath, PA  
EPA ID# - PAD002389559  
2010 Annual HW Exporter Report**

Dear Sir or Madam:

Pursuant to the requirements of 40 §CFR 262.56, Keystone Cement Company is providing this report regarding its hazardous waste exporting activity for the 2010 reporting year.

**Primary Exporter:**

Name and EPA ID No.:

Keystone Cement Company  
EPA ID# - PAD002389559

Tel: 610-837-1881

Mailing Address:

Keystone Cement Company  
P.O. Box A  
Bath, PA 18014-0058

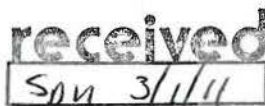
Site Address:

Keystone Cement Company  
Route 329  
Bath, PA 18014-0058

**Calendar Year ("CY") for this Report:**

CY 2010

ADMINISTRATION  
RT. 329, BATH, PA 18014-0058  
FAX 610-837-2267



PLANT  
RT. 512, BATH, PA 18014-0058  
FAX 610-837-2291

From: (610) 837-1881  
 Diana Borger  
 KEYSTONE CEMENT COMPANY  
 Route 329

Origin ID: UKTA



BATH, PA 18014

Ship Date: 28FEB11  
 ActWgt: 1.0 LB  
 CAD: 5434379/INET3130

Delivery Address Bar Code



SHIP TO: (202) 272-0167 **BILL SENDER**  
**Internat'l Compliance Assurance Div**  
**Office of Enforcement & Compliance**  
**1200 PENNSYLVANIA AVE NW**  
**U.S. EPA - MAILCODE 2254A**  
**WASHINGTON, DC 20460**

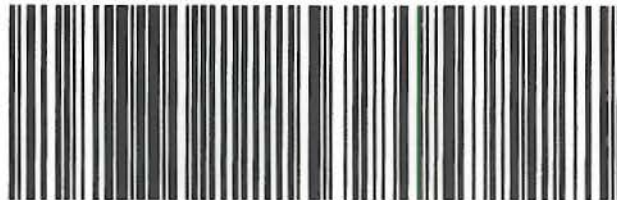
Ref #  
 Invoice #  
 PO #  
 Dept #

**TUE - 01 MAR A1**  
**STANDARD OVERNIGHT**

TRK# 7968 0946 8241  
 0201

**20460**  
 DC-US  
 DCA

**ZD RDVA**



50DGI/396A/7EFB

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**Consignee:**

Stablex Canada Inc.  
760, boul. Industrial  
Blainville, Quebec J7C 3V4

**Hazardous Waste Description:****Hazardous Waste No. 1**

Description:	Cement Kiln Dust from ancillary equipment for closure of RCRA permitted long-wet cement kiln
US EPA Hazardous Waste #:	F001 <sup>1</sup> , F002, F003, F004, F005, U001
DOT Shipping Name:	RQ Waste corrosive solid, basic, inorganic, n.o.s (calcium oxide)
Haz Class:	8
ID Number:	UN 3262
Shipping frequency:	1 shipment in 2010
Total Amount Shipped:	7,431 lbs
Transporter(s):	Horwith Trucks Inc., Route 329, Box 7 Northampton, PA 18067 U.S. EPA ID No. PAD146714878

<sup>1</sup> In addition to the six hazardous waste codes presented in this report, this material carried twenty-five additional waste codes due solely to the mixture and derived rules. The underlying hazardous constituents which comprise those additional codes were not present in significant concentrations. The additional waste codes are listed in Attachment No. 1.

**Hazardous Waste No. 2**

Description:	TSD tank farm piping from partial closure for RCRA permitted hazardous waste derived fuels facility
US EPA Hazardous Waste #:	F001 <sup>2</sup> , F002, F003, F004, F005, U001
DOT Shipping Name:	RQ Waste environmentally hazardous substances, solid, n.o.s (metals)
Haz Class:	9
ID Number:	UN 3077
Shipping frequency:	1 shipment in 2010
Total Amount Shipped:	13,914 lbs
Transporter(s):	Horwith Trucks Inc., Route 329, Box 7 Northampton, PA 18067 U.S. EPA ID No. PAD146714878

<sup>2</sup> In addition to the six hazardous waste codes presented in this report, this material carried fifty-seven additional waste codes due solely to the mixture and derived rules. The underlying hazardous constituents which comprise those additional codes were not present in significant concentrations. The additional waste codes are listed in Attachment No. 2.

**40 CFR §262.56 (a)(5)(i) & (ii) Descriptions**

Keystone Cement Company (Keystone) operates a Portland and masonry cement manufacturing facility in Bath Pennsylvania. Keystone utilizes liquid hazardous wastes as fuel within its onsite cement kiln.

Keystone primarily generates hazardous waste in the area of waste fuel management. Keystone makes a continual effort to reduce the volume or toxicity of hazardous waste generated onsite by implementing the following activities:

- Substitution for either process or maintenance materials.
- Initiation of pollution controls to enhance environmental effectiveness and reduce emissions.



- Improvement of operation through employee training.
- Improvement/modernization of physical plant for reduction of adverse environmental impacts.
- Daily facility inspections for equipment leaks, etc.
- Periodic changes in operating procedures to eliminate or reduce waste generation.
- Annual assessment and update (where necessary) of the facility Waste Minimization Program.

As part of a facility-wide modernization project, Keystone closed two of its RCRA permitted long wet kilns, and associated waste derived fuel piping, and replaced them with a single "preheater/pre-calciner" kiln. The exported hazardous waste streams described above were generated during the closure of a long wet kiln and hazardous waste derived fuel tank farm piping.

In 2009 Keystone generated approximately 253 tons of hazardous waste at its Bath facility. In 2010 Keystone generated approximately 27 tons of hazardous waste at its Bath facility.

A certification statement, pursuant to the requirements of 40 CFR 262.56 (a)(6), is provided as Attachment No. 3 to this submittal.

Please do not hesitate to contact me directly at (610) 837-1881 extension 2237 if you have any questions.

Sincerely,



J.P. Kleinle

Environmental Compliance Coordinator

CC: PA DEP, Bureau of Waste Management  
Rocco Marinaro, Keystone Cement Company  
Stephen P. Holt, Keystone Cement Company

Shipped via FedEx

## **Attachment 1**

In addition to the six hazardous waste codes presented in the attached report, hazardous waste No.1 materials carried the additional waste codes listed below due solely to the mixture and derived rules. The underlying hazardous constituents which comprise these additional codes were not present in significant concentrations.

### **Hazardous Waste No. 1**

U002	K022
U004	K048
U009	K051
U012	K086
U019	
U031	
U051	
U052	
U055	
U056	
U057	
U112	
U113	
U115	
U117	
U140	
U154	
U159	
U161	
U169	
U188	

## Attachment 2

In addition to the six hazardous waste codes presented in the attached report, hazardous waste No. 2 materials carried the additional waste codes listed below due solely to the mixture and derived rules. The underlying hazardous constituents which comprise these additional codes were not present in significant concentrations.

### Hazardous Waste No. 2

D004	U002	K048
D005	U004	K051
D006	U009	K052
D007	U012	K086
D008	U019	
D010	U031	
D011	U039	
D018	U051	
D019	U052	
D020	U055	
D021	U056	
D022	U057	
D023	U112	
D024	U113	
D025	U115	
D026	U117	
D027	U140	
D028	U154	
D029	U159	
D030	U161	
D031	U169	
D032	U188	
D033	U220	
D034	U239	
D035		
D036		
D037		
D038		
D040		

**Attachment 3**

**Certification: Keystone Cement Company 2010 Hazardous Waste Exporter Annual Report**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Stephen J. Hayden, Jr. Plant Manager

February 28, 2011

*Liana L. Berger for*  
*Stephen J. Hayden, Jr.*  
Signature